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February 11, 2020

Via ECF

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Ashton et al. v. al Qaeda et al., 02-cv-6977 (GBD) (SN)

Dear Judge Daniels and Magistrate Judge Netburn:

In anticipation of the February 19, 2020 deadline for the next round of applications to the United States Victims of State Sponsored Terrorism Fund (USVSST Fund), we write to inquire on the status of the following pending motions for final judgments against Iran, which we believe were all filed by the deadlines the Court set for anticipated decision in time for the upcoming USVSST Fund deadline. The chart below includes the original motion sequence number, the date of filing, the type of damages sought and details regarding the proposed judgment (such as ECF number and, when corrections were made, the updated filing date):

ECF No. of Motion	Date Motion Filed	Damages Motion Sought	Proposed Judgment Information
4718 et seq.	2019-07-31	Solatium Damages for Non-Immediate Family Members	Proposed Judgment Adopting in Part Report & Recommendation Filed 2020-02-10 (ECF No. 5891)
5428 et seq.	2020-01-03	Solatium Damages for Non-Immediate Family Members	Proposed Judgment Adopting in Part Report & Recommendation Filed 2020-02-10 (ECF No. 5891)

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ECF No. of Motion	Date Motion Filed	Damages Motion Sought	Proposed Judgment Information
5535 et seq.	2020-01-14	Estate Economic Loss	Updated Exhibits A-1 and A-2 Filed for <i>Ashton</i> Only 2020-02-07 (ECF Nos. 5881, 5881-1 and 5881-2)
5542 et seq.	2020-01-14	Solatium Damages for Immediate Family Members	Corrected Proposed Judgment Filed 2020-01-15 (ECF No. 5565)
5600 et seq.	2020-01-15	Solatium Damages for Immediate Family Members	Proposed Judgment Filed 2020-01-15 (ECF No. 5605)
5792 et seq.	2020-01-31	Personal Injury Damages for Individuals Injured on Sept. 11, 2001	Proposed Judgment Filed 2020-01-31 (ECF No. 5796)

We are mindful of the tremendous demand that the upcoming USVSST Fund has undoubtedly placed on the Court and submit this letter only because we must proceed with obtaining Farsi translations of any final judgments and commence service prior to February 19, 2020 for our clients to be eligible to participate in the next USVSST Fund round.

If the Court has any questions regarding the motions identified above, I am available directly at (212) 973-3406 and will aim to provide a response immediately upon request.

Respectfully Submitted,

By: /s/ Megan W. Benett
MEGAN W. BENETT